



Environment, Transport and Urban Regeneration April 2019



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Creating Suburbs for the Many and Building the Homes the Whole of Croydon Needs

Over recent weeks, residents and local representatives have been raising concerns about why the Council is supporting the redevelopment of single large homes with larger numbers of smaller homes typically in the form of small blocks of flats designed to look like large houses. There have also been calls to introduce area based planning committees due to concerns that Councillors from across the borough do not understand the concerns of residents across the whole borough. In response, Cllr Toni Letts and I have produced a briefing note for residents. I have included most of the text and images from the note below.

“A place to call home is at the very heart of all our lives. It is the foundation on which we grow up and raise our families, forge our dreams and aspirations. It helps us belong - shaping who we are and what we do.

Yet, for too many in Croydon, a place to call home remains beyond their reach. And for many who have a home, it is not safe and it is not secure.

Croydon Labour recognises that having a place to call home should be a fundamental right, and we have spoken to many residents who feel having a home they can call their own is simply out of reach.”

Extract from ‘Labour’s Plan for Croydon’, the administrations May 2018 Manifesto

We have a housing crisis in Croydon. We need to build many thousands more homes to ensure that everyone can have a decent home. Many of those new homes will be built in our suburbs, either between or behind existing homes or replacing older properties as set out in the Council’s Local Plan that was adopted in February 2018.

Many of these new homes will be flats in small apartment blocks. We will be allowing for more homes by reducing the amount of space given over to car parking, especially in areas close to public transport, stations and tram stops.

Quite a lot of our suburban areas cannot accommodate very much intensification, especially the areas with lots of terraced housing or more modern estates. However, some areas, such as those with lots of older houses on large plots of land, have the potential to provide many more homes. They will evolve over time to create suburbs for the many, not the few. They will become home for a wider mix of people and families whilst retaining their essential character and sense of place.

The Challenge:

We have a housing crisis that is leaving thousands of local residents unable to find a home they can afford. This is largely because for many years our society has not been building enough homes and especially affordable homes. In Croydon alone we have circa:

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- 650 households living in emergency accommodation
- 2000 households living in temporary accommodation, including 930 children
- 5000 households on the waiting list for a council home, almost all of whom are currently living in overcrowded conditions. But this figure understates the full magnitude of the situation. Just to get on to the council homes waiting list you have to be at least 2 bedrooms short of what is normally considered acceptable. Hence for example a family with two adults and two children of the same sex living in a one bedroom flat would not be eligible to join the waiting list!

The fundamental problem we have is that there are simply not enough homes in Croydon, London and the whole of the south-east of the country. This has pushed up rents and property values so high that many people simply cannot afford a decent and secure place to call home. In Croydon alone we need to be building 1000's of new homes every year. Our 2015 housing needs assessment identified the need for 47,000 new homes in Croydon over the next 20 years.

We have and continue to put in place plans to deliver homes and supporting social infrastructure that the residents of our borough need for the future. The level of growth needed is challenging. Difficult decisions have to be made. The Government is requiring us to deliver significantly more homes and unlike our immediate neighbours, we are rising to that challenge.

Delivering the homes we need:

The Council is working hard to address the lack of housing. It is building new homes through its wholly owned developer Brick by Brick and by encouraging and enabling property developers and housing associations to build more homes.

The current target in the Croydon Local Plan is to allow 33,000 new homes to be built over the next 20 years. Recent evidence and new Government targets have shown this will need to increase substantially. The draft new London Plan proposes that this should increase to 48,000 with almost 3,000 homes being built per year for the first 10 years. We agree with these numbers but have told the Mayor that he will need to provide additional public transport and support our building of new schools and other community facilities if this increase is to be sustainable.

There are currently approximately 155,000 homes in Croydon.

Many of these new homes will be built in the metropolitan centre of Croydon and on brownfield sites across the borough. But these sites can only accommodate about 22,000 new homes. We are looking at ways to increase this but there are limits to what can be achieved whilst also providing high quality homes in attractive and sustainable places. Hence there is not enough space in these locations alone, so many of the new homes must be built in the suburbs. Currently circa 11,000 new homes will need to be sensitively knitted into existing neighbourhoods.

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Thousands of new homes are already being built in the town centre on derelict or under used sites. Over 2000 new homes are on site at the moment. Planning permission is being considered for thousands more. Towers are rising up fast across the 'city centre'. These include:

- Dingwall Road - two sites, one nearing completion as the other commences
- Queens Gardens - 513 new homes replacing the old Taberner House
- 101 George Street - what will be the tallest prefabricated residential tower in the world (546 new homes)
- Addiscombe Grove - 100% affordable new tower
- Cairo New Road - a tower with town houses around its base
- The former Nestle Tower (290 new homes)

In addition planning consent has been granted for over 900 new homes on Lansdowne Road, over 1000 along Wellesley Road and a further 500 on Cherry Orchard Road.

Planning permission has also been granted for the redevelopment of the old post office sorting office next to East Croydon Station too, but the owners have decided not to proceed with the development yet. The governments rules makes it challenging, time consuming and expensive to compulsorily purchase sites like this, making us largely dependent upon developers to decide when they want to start building. However, in the case of the old post office sorting office, Network Rail have told us that they need this site to rebuild East Croydon Station and allow the Brighton Mainline upgrade to be built. The redevelopment of the station could allow many more homes to be built in the area through building above it. The delay in providing a few hundred new homes could result in over thousand more!

Homes are also being delivered across the borough in our suburban neighbourhoods as the photographs below illustrate.



A small block of flats takes shape on Riddlesdown Road. The new building is more in keeping with the character of the surrounding area than the single house it has replaced



A stylish new home overlooking Croydon's skyline replaces old garages on Riddlesdown Rd



Two new developments on South Norwood Hill nearing completion

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Demolition of an older style home commences of Selcroft Road to make way for nine new homes

Growth across the borough

Almost all areas will need to continue to grow with more intensive development. This is nothing new. We have been building new estates and replacing older homes ever since development began in Croydon. Most of our local suburban areas are less than one hundred years old and have changed hugely over that time. Most areas have a mix of older homes with modern estates and new infill properties. There is a mix of houses bungalows and flats.

Our suburbs will therefore continue to grow, evolve and change. To accommodate all the new homes we need whilst protecting our precious open spaces, parks and woodlands, the new buildings accommodating the homes will inevitably need to be closer together, taller, wider and deeper. This approach appears to be accepted and encouraged by Government through continued relaxation of the town planning regime, although we would prefer to plan and manage such change. Many new homes will be flats as opposed to traditional houses. They will accommodate families as well as young people who may well have grown up in the local area, older local people who want to downsize, divorcees and people living in many other circumstances.

We are committed to delivering the homes local people need, allowing our suburbs to continue to evolve to meet the changing needs of the whole community.

Praise for Croydon's Approach:

The Secretary of State for Housing, Communities and Local Government - James Brokenshire recently publicly applauded Croydon Council for its delivery of new homes. Talking about the need to build more homes in London at a recent conference Brokenshire said

"London's boroughs can and must also lead the charge – both individually and by working together across boundaries – to match the record of those such as Croydon, Westminster and Wandsworth, which are going the extra mile to build more homes."

The Government's own statistics indicate that Croydon is the 8th highest local planning authority in England in terms of the number of homes delivered between 2015 and 2018 (6,989) which is 151% of what was expected. Thinking ahead, our 5 year housing supply remains in a healthy state with 8,068 new homes in the pipeline. These new homes are being delivered and/or consented across all forms of housing supply which highlights our comprehensive, proactive and joined-up approach.

Following National, Regional and Local Planning Policy

Some residents are concerned about how planning applications are being decided and whether planning policy is being followed. The high proportion of applications that are being approved is also being questioned.

The Planning Committee and planning officers have to make their decisions on whether or not to approve a planning application based upon planning policies set by the government, the Mayor for London and our own local Council. Often it is a matter of balancing the weight given to each policy. The points of view received from consultees such as the local flood authority and issues raised by local residents are all taken into consideration, initially by the planning officers and subsequently, in the more contentious cases, by the Planning Committee.

The opinions of local residents are carefully considered. However, planning consultations are not a form of referendum. Neighbours do not, and never have had, a veto over what can be built next door. The number of objectors or supporters is not a relevant consideration when making a planning decision. It is the quality of the argument that counts. A single objection raising a key consideration can be more influential than a thousand objections raising other matters.

At the heart of the planning system is the Government's NPPF which was first introduced in 2012, but which was updated last year as well as more recently in February 2019. Interestingly local MP Chris Philp was the Parliamentary Private Secretary (assistant) to the Secretary of State who was responsible for the 2018 version of this highly influential document.

The Government is very keen that developers are allowed to get on with building new and hence clause 10 of the NPPF says:

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“So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.”

(Sustainable is defined in the widest sense.)

The ‘presumption in favour of sustainable development’ is a very powerful aspect of the NPPF. It is the main reason why such a high proportion of planning applications are granted. It requires that there have to be very strong reasons to refuse a planning application.

In clause 11 it goes on to say:

“Plans and decisions should apply a presumption in favour of sustainable development.

For decision-taking this means: ... approving development proposals that accord with an up-to-date development plan without delay;”

The ‘development plan’ for Croydon is up to date and in accordance with the NPPF and the London Plan, having been adopted following detailed scrutiny by a senior Government Planning Inspector by the Council in February last year.

The Council is required by the Government to work closely with property developers to help them achieve acceptable planning consents that meet the various planning requirements. Under section 4. ‘Decision-making’ in clause 38 it says:

“38. Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”

Often residents are concerned about an apparently close working relationship between our planners and property developers. The Government encourages this relationship. The planning system is not set up to provide a level playing field. The presumption in favour of sustainable development tips things heavily in favour of the applicant. Our planning officers though have to remain impartial when making their recommendations.

Crucially, there will be serious consequences should we fail to determine in accordance with planning policy. Applicants have a right of appeal against refusals of planning permission and consequently, we need to ensure that such refusals are soundly based (in

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accordance with policy). We are judged by Government on our appeal performance (with a strong expectation that our decisions are upheld by the Planning Inspectorate). An increase in the level of appeals allowed (contrary to the views of the local planning authority) will inevitably highlight a fault in our decision making which might well make us open to special measures or closer Government scrutiny. We might also be liable for awards of costs where planning permission has been refused on an unreasonable basis. We are keen to avoid wasting tax payers' money in this way.

Moreover, if the Council does not follow the correct guidelines and procedures, it could be answerable to Local Authority Ombudsman or a Judicial Review in Court. No successful case has been brought against the Council on planning matters under the current Council administration. The Planning Committee always has a solicitor present to ensure that everything is conducted in an appropriate manner.

A Planning Committee that makes the right decisions for the whole community

"....members are involved in planning matters to represent the interests of the whole community"

Planning Practice Guidance 2013

Planning to provide all the new homes local people need is a strategic matter for the whole borough. The housing crisis affects all residents who care about our society as a whole. It cannot be resolved by building homes in just a few places. The whole borough will need to evolve to meet our housing needs with more homes being built everywhere where there is already development. The Croydon Local Plan is a borough-wide document which identifies with the 16 Places of Croydon whilst presenting a holistic, joined-up and managed approach to housing delivery across the borough.

To make the strategic decisions for the whole community we need a Planning Committee that looks at the wider perspective rather than local committees that might only consider the narrow interests of one area. We need a Planning Committee that thinks of those who are rarely heard; the children filling our schools who will want homes of their own in a few years' time; those who cannot afford the over-inflated housing prices despite being teachers, nurses and police officers; those who cannot find a permanent home; the homeless and the overcrowded. We need a Planning Committee that is prepared to take the often difficult decisions to make sure that everyone can find a home they can afford and enjoy.

We are not going to solve the housing crisis by saying how awful it is, but then opposing building the homes local people need in our own 'back yard'! Difficult decisions that might well be unpopular with immediate neighbours, need to be made.

We need to bear in mind that it can be all too easy for those who are already on the housing ladder to pull it up behind them! Every neighbourhood needs to evolve to accommodate 100s of new homes to help meet the overall demand.

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A few local authorities have different planning committees for each area they cover. We do not support the idea of having area based planning committees; it opens up the local planning authority to greater risk of legal challenge and a significant increase in planning appeals, with inevitable inconsistencies in planning application decision making and potentially, a more parochial determination process which might well ignore development plan policy. It will also slow down the planning application determination process with a potential increase in the number of appeals against non-determination. It is notable that very few other boroughs have area based planning committees.

Our Planning Committee makes sound planning judgements for the whole borough. These decisions are based upon the planning policies set out by the Government, Mayor for London and the Council. Almost all our decisions follow the recommendations made by our highly professional and experienced team of planning officers. Not a single decision made by the Planning Committee has been overturned by a Judicial Review since 2014. The Committee members represent the whole of the Council on the Planning Committee, not just the wards that elected them. They are familiar with the whole borough and are more than capable of understanding the strategic needs of the community whilst also taking into consideration the legitimate concerns of local residents and other stakeholders.

The Planning Committee always listens carefully to the concerns of local residents and any other stakeholders and relevant 'material' considerations are taken into account when making decisions. We do not necessarily agree with the objections raised though. Often the perception of the impact of a development on its neighbours is much greater than reality for example. Often this is the case with regards to issues such as the extent of overlooking and overshadowing, parking requirements and increase in traffic.

To set up local committees would cost local council tax payers considerably more money to manage and run and would ultimately result in the same outcomes. Each committee would have to judge the planning applications using the same planning 'rules' and if they refused applications inappropriately their decisions would simply be overturned by a Government appointed planning inspector at appeal. This would cost tax payers even more money through extra costs and the likelihood of the Council having to pay compensation to developers. If we started to fail to deliver on our housing targets the Government would step in and insist we allow developments to go ahead.

Giving Local Communities a Greater Say on Planning in their Local Neighbourhoods

We would definitely like to see local communities more involved in the planning decisions for their local areas. The best way to do this is through the community coming together to develop a 'Neighbourhood Plan'. This would be a recognised planning document specifically for the local area that has to be agreed by the local community through a referendum. It is therefore truly a reflection of the community's collective view.

Local residents lead the Neighbourhood Plan's development, deciding on how their area can be developed, what they want to see preserved and where things can change. The Plan does though need to comply with the requirements of national and local planning policy. It is not therefore a way of avoiding growth and providing the homes that people

need, but it allows the local community to have a strong voice in deciding where those new homes should be located and in what sort of buildings. Work is already underway in the Crystal Palace area on a Neighbourhood Plan covering an area incorporating the four boroughs that come together there and residents in Shirley are considering whether to develop their own Plan.

Building Modern Homes to Meet Today's Needs

The new homes in our suburbs will typically be built in small blocks of flats designed to look like large houses or in clusters of small houses. Where such schemes have already been built, residents who initially objected to them have been pleasantly surprised by the finished buildings.

Less precious space will be given over to cars as other, less polluting, more sustainable forms of transport become available or more accessible. Where space is available on the roads it will be used more often for parking when needed. Most of our garden space will be protected, along with our parks and other open spaces.

More schools and other social infrastructure is already being planned for to accommodate the growing population. Higher densities of homes in our suburbs will actually support existing and new community facilities such as local shops and bus services.

Concerns have been raised about the loss of family homes. Typically, we are seeing old houses and bungalows on large plots of land being redeveloped to provide eight or nine new, smaller homes. We require at least one of these to be a three bed 'family sized' apartment, but increasingly we are seeing more, larger homes in the new schemes. In reality though there are a lot of smaller families for whom a two bedroom flat is perfectly acceptable. The one bedroom flats are needed too of course. Very large houses are being replaced by a range of smaller family sized homes.

We are encouraging larger plots to be assembled which will allow more homes to be built. By combining two or three existing plots much more efficient schemes can usually be developed, with greater scope to mitigate any harm to their neighbours and deliver affordable housing.

Some people are calling for lower density redevelopment of existing houses, but this would simply mean that even more existing homes would need to be demolished to meet our housing needs. It would also push the price of the new homes up significantly higher.

Protecting the Character of the Area and Delivering High Quality Design

We are committed to retaining the character of each of the places in Croydon, so that despite evolving and growing to meet the needs of our society, they will still have the same look and feel. When we talk about the character of the area though we are referring to the physical aspects of the place. The socio economic status and make-up of the current households is irrelevant. The outcome of the changes will hopefully be more balanced and mixed communities in the future.

The Council will be adopting new planning guidance in the near future that will help to guide the intensification of the suburbs positively and encourage high quality design. This will demonstrate that new buildings can be modern in appearance whilst still respecting the character of the area. Most of our streets have a mix of building styles and ages. That variety often defines their character. We are continuing the tradition of supporting modern design.

Providing Affordable Homes

Many of the homes that we need in Croydon need to 'affordable' to accommodate those of us on lower incomes. We are committed to ensuring that a high proportion of the new homes built in the suburbs are affordable too.

Frustratingly though the Government does not allow the Council to insist the affordable housing is provided in smaller scale developments of less than 10 new homes. Clause 63 of the NPPF says:

“Provision of affordable housing should not be sought for residential developments that are not major developments,”

We are though encouraging developers and Housing Associations to work together so that some of the small blocks of flats being built in areas like Purley and Sanderstead will provide affordable homes. The London Mayor is seeking to introduce a policy in the New London Plan which will allow London Boroughs to introduce planning policies to require a financial contribution towards affordable housing delivery in respect of smaller housing schemes. We are firmly supporting the London Mayor in his endeavours and these smaller sites should hopefully contribute to affordable housing delivery in the future – either on site or in the form of a commuted sum.

Clarifications:

Some people are calling for a 'brownfield first policy', suggesting that the Council should only allow development in suburban areas once there are no brownfield sites available in the rest of Croydon. However, the Council is unable to do this, even if it wanted to because of the Government's planning rules as set out in the NPPF. Government policy calls for all planning applications to be decided on their own merits and with a presumption in favour of planning consent, especially for new homes.

We need to be seeing the development of new homes across all the developed areas of the borough. Simply building in just a few areas will fail to deliver sufficient new homes fast enough. But the Council also believes people should have a choice about where they live. Some people want to live in the centre of town whilst many others want to live in the suburbs. Our planning policies give them that choice.

If a 'brownfield first policy' was adopted it would ultimately mean all of the new homes in

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Croydon would then need to be built in the suburbs resulting in huge amounts of development over a short period of time. Our evolution approach is much more appropriate.

The proposal to introduce area based committees appears to be based upon an assumption that they would place greater pressure on local planning committee members to refuse applications. Presumably this is based upon current voting patterns. This presumption is I am sure unfair, but if it proved to correct it would be particularly unfair on those who need those new homes and would hence fail to meet the needs of the wider community. Their decisions would be overturned anyway at appeal by one of the Governments inspectors. Our approach of supporting Neighbourhood Plans would deliver a real say for local communities.

Our Bids for Future High Street Funding

Croydon will be submitting three 'expression of interest' stage bids for the government's Future High Street Fund, for South Norwood, Thornton Heath and London Road (from Broad Green to Norbury).

This is funding administered by the Ministry of Housing, Communities and Local Government, totalling £675m over two bid rounds in 2019 and 2020. This follows the publication of the High Street Report prepared by an expert panel chaired by Sir John Timpson ahead of last year's Budget. This recommended that the Government set up a High Streets Taskforce to support local leadership, and establish a new fund to support the renewal and reshaping of high streets and town centres.

The funding is intended to support high streets with demonstrable structural challenges. The fund's investment is principally targeted at physical infrastructure, including improving transport access and flow, and land assembly to support the development of new housing and workspace.

All Croydon's District Centres were analysed against the funding criteria, with the three places scoring most highly against the requirements going forward for expression of interest bids.

More detail on the funding can be found online [here](#).

Minster Green Transformation

An exciting new public space will transform the area around Croydon's Grade I listed Minster. This Growth Zone project aims to restore the Minister's status as the historic core of Croydon and as a destination, accommodate a variety of activities, improve the



crossroads of two main pedestrian and cycle routes and incorporate the Minster as a stop on the borough's heritage trail. Minster Green and St John's Memorial Gardens – the two areas of green space on either side of the Minster – will be upgraded and play facilities could also be provided within the memorial gardens.

A two-day public exhibition was held in mid-March and feedback received is being considered. Further

material regarding the project can be found on the Council's website via the following link - <https://www.croydon.gov.uk/planningandregeneration/regeneration/regeneration-works-in-croydon/enhancing-the-minsters-public>

Delivering Our Strategic Housing Targets for New and 3 Bed Homes

Effective housing delivery is a key part of achieving the growth and planned development in the borough. The Croydon Local Plan adopted in February 2018 is the spatial planning mechanism through which Croydon will achieve the planned growth in the borough for the next 20 years. Within the Local Plan there is a target of circa 33,000 homes between 2016 and 2036. There is a strategic policy target to achieve 40% of all new homes as affordable housing through the planning system. In addition to homes themselves, one of the key areas of housing need that is addressed in the Local Plan is the delivery of family sized homes through a retention policy and a strategic target for 30% of new homes to be family sized homes. Despite only being adopted last year the Local Plan is planned for review to align with the new London Plan with one of the significant areas of change an increase in the housing target. Also, how the strategic policy targets for key housing issues are being achieved over the life of the plan will be assessed and refined should it be necessary through the Local Plan Review.

From Meatpackers to 120 new homes on Cherry Orchard Road

40-60 and 42 & 42A Cherry Orchard Road is a key transition site on Cherry Orchard Road between the high rise of Croydon town centre and lower buildings of Addiscombe.



The application was presented to planning committee at pre application stage on the 22 March 2018. At that time the scheme proposed a 7/8 stories building with a basement and 10 car parking spaces - the scheme had 94 units and 19% affordable housing. Members and officers felt the scheme could go taller, reduce parking provision and remove the basement with the aim of increasing the proposed level of affordable housing. The applicant responded to the points made by members at Planning Committee and this resulted in a

planning application being submitted for a 7/9 storey building with 120 units and 32% affordable housing units (including London Affordable rent and London Living Rent). 30% of the units are family sized accommodation. The scheme also widens and upgrades the alleyway, adjacent to the site, which is currently in a poor state of repair. The scheme demonstrates the positive outcomes which can be achieved when developers proactively engage in the Council's pre application process.

Purley Baptist Church – questionable decision quashed

I am delighted that the Secretary of State has conceded and accepted that his decision to refuse planning permission in respect of Purley Baptist Church was unsound and should be made null and void. The Council supported the developer (as an interested party) in their legal challenge; it is anticipated that the Court Order should be signed in the next few days thereby quashing the decision. The case will now be referred back to the Secretary of State for his re-consideration.

I eagerly await the next stage in this somewhat unfortunate process and hope that common-sense will prevail; the scheme which includes 220 new homes was supported by the Council's Planning Committee as well as the London Mayor. Our resolution to grant was agreed over two years ago and this further delay only serves to blight the development potential of this key allocated brownfield site, situated in a sustainable location.

£32,000 + Costs for Flouting Our Planning Law

The Council has successfully prosecuted Mr Wellesley Cole of 64 Foxley Lane who continually failed to comply with the terms of an enforcement notice relating to an extension of an outbuilding to the rear of his property and its use as a single dwelling.

Not only was Mr Wellesley Cole found guilty but now faces a £12,000 fine, a £20,000 confiscation payment (in recognition of income generated by unlawful activities) and meeting the Council's cost in full. On sentencing, Judge Robinson said Mr Wellesley-Cole had "consistently flouted planning law" and "had ample time to comply with the notice".

This successful prosecution shows Croydon Council and the courts take the flouting of planning laws extremely seriously. This unauthorised extension has led to an expensive day in court for Mr Wellesley-Cole and it should be a lesson to anybody considering going ahead with ill-conceived developments in contravention of planning regulations in place to protect the local environment and residents.

Developers Embracing Affordable Housing

It is interesting to note that in response to housing market conditions – with a possible Brexit-related dynamic, some housing developers (especially in Croydon Town Centre) are proactively engaging with affordable housing providers; for them to take a number of private housing units off their hands. These units are being delivered as affordable housing units (both shared ownership and affordable rented at London Affordable Rents).

This to be welcomed, in terms of increasing the stock of affordable dwellings within Croydon Town Centre and clearly indicates the need for early dialogue with affordable housing providers as part of scheme development. This is something to bear in mind as future schemes come forward at pre-application and planning application stage.

Place Review Panel's 2nd Birthday

The Council's Place Review Panel (PRP) has now been in place for just over two years and a very busy two years has seen the PRP undertake the following:

- 55 Place Reviews
- 49 Schemes or projects reviewed
- 5 Workshops
- 6 second reviews
- 8 Croydon Council schemes reviewed
- 7 Internal design policy documents

The variety of projects and schemes reviewed by the PRP has been considerable. Projects and schemes reviewed include the following – schools, large residential schemes, large mixed use schemes, a football stadium, parks masterplans, urban parks, a youth centre, leisure centre, public realm schemes, highway scheme, recladding residential towers, affordable housing and a suburban design guide.

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The core objectives of the PRP remain the following:

- The panel helps enhance Croydon's built environment to create an attractive destination and places
- The panel supports the Council's commitment to ensure development leaves a legacy of vibrant places and design that will be loved and admired by residents and visitors alike.
- The panel provides independent and expert design advice on major and complex schemes, design policy documents and public realm schemes.
- The panel's report of a project and scheme supplements the design advice provided by the Council's Spatial Planning Service.



The Housing Delivery Test

The Housing Delivery Test (HDT) is a new annual measurement set by the Ministry of Housing, Communities & Local Government to determine if Local Authorities are delivering their housing requirement. If a local authority is not reaching the housing requirement determined by the HDT, additional requirements and conditions are imposed on the Local Authority. The 2018 HDT results were recently released, which identified Croydon as one of the authorities that passed the test and as such are not penalised. Croydon exceeded the HDT requirement by 151% as we consistently delivered homes across the monitored three year period, with a total of 6,989 homes delivered.

It is envisaged that Croydon will continue to meet their HDT requirement across future rolling three year periods against the current housing target due to the up to date Local Plan, proactive planning and consistent housing delivery. This means that the Council will be able to apply the Local Plan and other development plan policy with full weight. The challenge in the future will be maintaining this performance against an emerging London Plan housing target of 2,949 per annum, which is an increase on our current housing target of 1,646 per annum. This is a challenge we are seeking to address in the current Local Plan Review.

Croydon Westfield

Croydon Limited Partnership (CLP) are currently refining the development proposals to ensure that they are best equipped to deal with the challenges facing the High Street and the specific requirements of future occupiers. Discussions are being undertaken between CLP and the Council. These are moving forward in a positive manner to develop the scheme towards detailed design. The Council is also progressing public realm works in close proximity to the site, which comprises the designs for Wellesley Road including a new pedestrian crossing at the junction with Lansdowne Road across Wellesley Road into the site. CLP remain committed to the development and are working closely with Croydon Council to bring the development forward.

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Why Mipim Matters

This week, Jo Negrini, Shifa Mustafa and Heather Cheesbrough attended MIPIM alongside Develop Croydon, Stanhope Schrodgers and a number of other Croydon investors. MIPIM is an annual international real estate exhibition and conference that takes place in mid-March each year in Cannes, France. The event is attended by professionals in the real estate sector including developers, investors, landowners and organisations promoting or seeking investment opportunities. MIPIM is a place where organisations can show the world what they have to offer and can make connections with organisations to potentially partner with in the future.

Croydon Council has attended MIPIM in the last few years, and has used the global platform to launch various initiatives and promote Croydon's £5.25 billion regeneration programme. This year, Croydon has launched a major announcement around the Croydon Creative Campus. The next step in Croydon's rapid progress of using housing, cultural, placemaking and retail development to transform the city into one of London's most desirable places to live, work and play. Croydon announced its aspiration to attract and partner with international universities and further announced London South Bank University (LSBU) as its first partner to support the Council's aspiration to become a global centre of learning. By integrating new opportunities for learning, Croydon will not only increase its growing appeal, but also its capacity to respond with greater resilience and creativity to the many challenges modern cities face.

Attending MIPIM gives Croydon Council the opportunity to launch and promote major announcements on the world's stage to a targeted audience, all in one place at one time. This makes for a far greater impact and allows for greater efficiencies than going out to individually meet and target international investors, developers, and now universities to inform them about Croydon's offers and aspirations for its residents and businesses.

Changes to the NPPF

Revisions to the NPPF were published by the government on 19th February 2019 as well as to the supporting Planning Practice Guidance (PPG) on housing and economic needs assessment. This was based on a consultation undertaken by the government in October to December 2018. The following are the key changes:

1. The NPPF states that when calculating housing need / land supply, the now introduced standard method should be used. The standard method uses a formula to identify the minimum number of homes expected to be planned for in the Local Plan.
2. This methodology includes a cap which limits the increase an individual local authority can face. Where housing targets were adopted within the last 5 years, the local housing need figure is capped at 40% above the average annual housing requirement figure set out in the existing policy.
3. For areas covered by spatial development strategies (The London Plan), the relevant strategic policies are those contained within the spatial development strategy. Currently

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it is considered that where a requirement figure for an authority in a spatial development strategy differs from that in a local plan, the figure in the spatial development strategy should be used.

4. The definition of 'deliverable' sites for the purposes of demonstrating a housing land supply has been amended to make "clearer that non-major sites with outline consent should be considered deliverable unless there is evidence to the contrary".

The revised guidance includes a new section advising how authorities can determine the type and quantity of employment land they need.

Five powerful tips from the Government for getting planning permission – An extract from the Planning Portal

As part of my regular Cabinet Members review of planning policy I was interested to find the following article of the Governments 'Planning Portal' website that could be of use to local residents and developers.

The success of your planning application will depend, in part, on the quality of your preparation, the accuracy of your designs and the development of your relationship with the relevant parties. With these basic principles in mind, we've supplied five key considerations for the planning process.

- 1) **Create quality designs:** *Design is the most important aspect of the planning permission process. Good design should mediate between policy and ambition. Be it a small extension or a brand new build, good design should always include appropriate scaling and a smart layout and should strive to protect and enhance the character of the surrounding environment. To optimise your designs for a successful application, it is advisable to consult a skilled architecture firm that specialises in obtaining planning permission.*

"Good design can work wonders for you. Good design can help you increase your chances of getting the planning permission you want." - Ufuk Bahar, Urbanist Architecture

- 2) **Research relevant planning policies:** *To produce effective designs, it's important to research the planning policies that directly affect your project. Local planning authorities (LPAs) may have multiple overlapping policies in their development plan. Be sure to determine which ones will influence the outcome of your application.*

With any proposal, certain issues will be taken into account. These are often referred to as 'material planning considerations'. It is for your local planning authority to decide how much weight should be given to each. Here are a few common examples:

- *Loss of sunlight*
- *Noise or disturbance*

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- Capacity of physical infrastructure
- Effect on listed buildings and conservation area
- Layout and density of building design and finishing materials
- Overlooking and Loss of privacy
- Overshadowing and Loss of outlook
- Smell or fumes
- Loss or effect on trees
- Incompatible or unacceptable uses
- Highway issues including traffic generation, vehicular access, highway safety

A skilled planning and architecture firm can do all the policy research for you and can determine which planning considerations will directly affect your proposal. Ultimately, the firm will use their planning expertise to write an effective Design and Access Statement, which will be used to convince the LPA that your proposal does indeed comply with the relevant policies.

- 3) **Build a relationship with your planning officer:** *It's imperative to develop a positive relationship with your planning officer, as this person will most likely be responsible for making the final determination on your application. The process of liaising with planning officers requires some finesse. For this reason, you might consider hiring a skilled architect and planning consultant, as they will have experience working with planning authorities. A planning consultant can also monitor your application as its being processed and if a problem arises, they can liaise with the officer to help obtain a positive outcome.*
- 4) **Contact all relevant parties:** *A planning and architecture firm can also handle all technical issues that might arise during the planning application process. For instance, your proposal may require flood risk assessments, tree surveys, archaeological investigations and any number of technical reviews. By contacting the appropriate organisations ahead of time, your architect can prevent technical issues from undermining your proposal.*
- 5) **Hire a skilled professional:** *Many people decide not to hire planning consultants because they think not doing so will save them money. In fact, hiring a consultant can be a worthwhile investment that actually saves money, time and effort. It is therefore advisable to find a multidisciplinary architecture firm that focuses on planning permission. The firm should:*
 - Collaborate well. *They should produce designs that satisfy both your needs and the needs of the planning authority. They should cultivate strong relationships with you and with the planning authority.*
 - Communicate well. *They should simplify complex ideas and clearly communicate priorities, instead of using jargon and complicated expressions.*

- *Have 'know-how' expertise. They should understand the pitfalls of planning applications and have a strong grasp of UK planning law, contemporary design practice and planning policies.*
- *Have an impressive track record. They should offer you examples of previous work and should be open about their rate of success for planning permission applications.*
- *Pursue creative solutions. When obstacles arise, the architect should provide flexible solutions that optimise the usage of space and increase chances of a successful application.*
- *Be an RIBA chartered architecture firm. RIBA Chartered Practices are the only architectural practices endorsed and promoted by the Royal Institute of British Architects (RIBA), through commitments to quality assurance, business management and client service.*

In the end, the right architecture firm can produce quality designs that comply with your LPA's development plan, while maintaining strong ties with the planning officer in charge of your application. For this reason, it is a good idea to hire a firm that specialises in obtaining planning permission.

Transport and Environment

Liveable Neighbourhood Bid

In November 2018 the council submitted an ambitious bid to Transport for London (TfL) as part of the Mayor of London's Liveable Neighbourhoods programme. The bid was named 'Reconnecting Old Town' and sought £9.56m in funding from TfL to revitalise and reconnect Old Town and the area around Roman Way. The total combined value of the project is just over £17m once match funding of £7.7m from other sources, including the Growth Zone, is taken into account.

Earlier this month we were informed that our bid had been successful (21 other boroughs submitted bids in competition with ours) and we have been allocated the full budget amount we sought. The project is anticipated to commence this year (feasibility stages) and be completed by 2023.

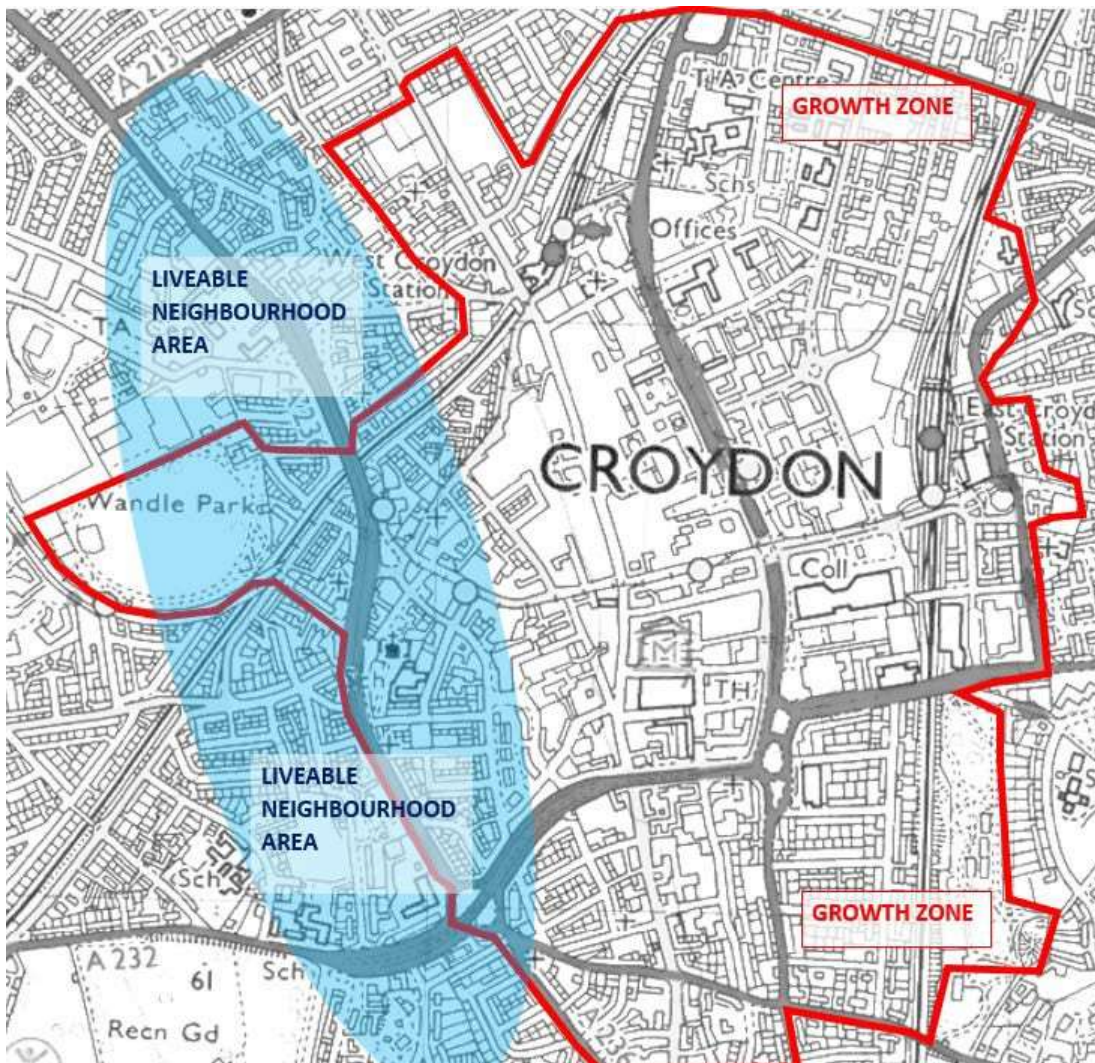
About the project

Croydon's Liveable Neighbourhood (LN) project sits at the western edge of the Croydon Town Centre at the heart of historic Croydon Old Town.

This Liveable Neighbourhood proposal builds on and refines some of the main project proposals in the Old Town Croydon Masterplan and aims to:

- reconnect the Old Town neighbourhood and community, split by the construction of the 'urban 'motorways'; and
- reconnect the community with its schools and with their parish church (Croydon Minster).

The project will achieve this by tackling pedestrian and cyclist severance, and reducing traffic dominance at the Croydon Flyover/Old Town roundabout and along the A236 Old Town/Roman Way corridor. Proposals include creating new segregated cycle lanes, installing screening and soft landscaping along the route to protect residents from noise and pollution. We will be removing the 1960s subways and creating safer and more attractive surface crossings for pedestrians and cyclists. The interventions proposed will help counter the grey concrete, traffic noise and air pollution. It will transform the perception of the ring road and the underpasses, turning them into an attraction in their own right.



Overview of Liveable Neighbourhood area:

The project will support 'Good Growth' in the area (15,000 new homes proposed for Growth Zone area in draft London Plan) and act as a catalyst for an uplift in active travel in an area that has Outer London's highest potential levels of walking, cycling and mode shift away from car trips.

Meetings with ward councillors and key stakeholders will be organised in the next few months once officers and I have met with the Walking and Cycling Commissioner.

The project is made up of 6 different phases as set out in the table below.

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Section	Description
1	Old Town Roundabout & Croydon Flyover – Accessibility, environmental and safety improvements – new crossings & improving subways
2	Old Town / Roman Way - Healthy Streets Boulevard – cycle lanes, new crossings, screens
3	Improving east-west connections between Wandle Park and the Growth Zone, new crossing, lighting subways and underpasses, improving car parks
4	Roman Way / Factory Lane / Derby Road - Vision Zero junction redesign – complete redesign of junction
5	Mitcham Road – road danger and traffic reduction measures, continuous footways and new crossings, banned right turns preventing rat running
6	Behaviour change and supporting measures
	TOTALS

Diagram showing overview of the different project sections:



Visualisations of proposed interventions included in the bid document.

Segregated cycle lane on Old Town



Greening and noise screening on Roman Way Jubilee Bridge flyover.

Personal injury collisions and casualties in the Liveable Neighbourhood (36 months up to Feb'18):

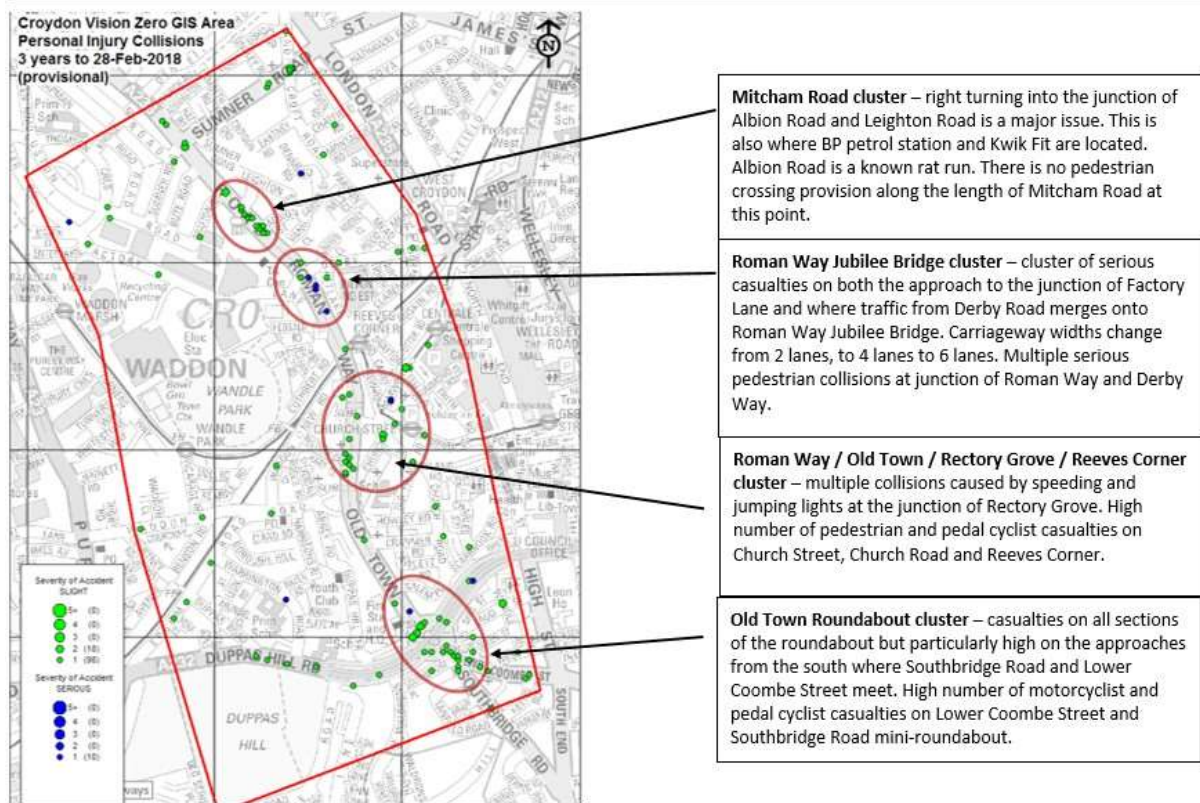


Figure: Vision Zero Collision Plot – Liveable Neighbourhood Area – 36 months up to 28/02/2018

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